

CEQA Guidelines  
Testimony to Natural Resources Agency  
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Thanks for the opportunity to speak.

I want to address two changes in the CEQA guidelines that, if made, I believe would result in dramatic increases in the amount of walking and bicycling done and related reductions in greenhouse gas emissions.

First is the elimination of Level of Service from the Appendix G checklist questions on transportation/traffic impacts. Initially the Office and Planning and Research proposed that elimination, but then reinserted LOS as a measure of congestion. The problem is that while LOS is quantifiable and has a history of use; it is not an environmental impact. Being measurable and having an established history not enough to qualify it as an impact. LOS measures motorists' delay or convenience. Motorists' delay and convenience are simply not environmental impacts.

What's more the usual mitigation for decreased LOS is increased road capacity. That supposed mitigation does have an environmental impact. Increased road capacity results in more vehicle trips and fewer trips by bike or foot. It's a case where the mitigation is far worse environmentally than the impact. The cure is worse than the disease.

It's always been a mistake to consider a decrease in LOS as an environmental impact. Because of global warming; it's now a more egregious mistake.

On the other hand, traffic safety is an environmental impact. There is no question that traffic crashes have an adverse impact on human beings and thus qualify as an impact. Crashes result in injuries and deaths. Yet traffic safety is given cursory coverage in the Appendix G checklist questions and, as a result, cursory coverage in environmental impact reports.

I would guess that virtually everyone in this room has been involved in a traffic crash. Many have probably been injured in a crash or know someone who has been. About one in 60 people will die because of a traffic crash. Yet when the Sacramento Area Council of Governments did the environmental impact report for its 25-year Metropolitan Transportation Plan, traffic safety was barely mentioned. Over the life of the plan, thousands of people will likely die in traffic crashes in the region, and scores of thousands would suffer injuries, including serious brain and spinal injuries.

Traffic safety is primarily related to traffic speeds, distracted driving and driving under the influence of drugs or alcohol. Traffic speeds are related to road capacity and design. None of these factors are mentioned in the Appendix G questions. They need to be.

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